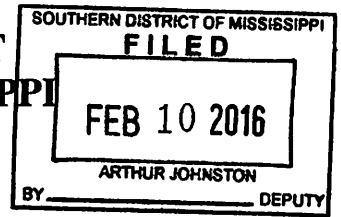


**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI  
SOUTHERN DIVISION**



DOUGLAS HANDSHOE

v.

VAUGHN PERRET, CHARLES LEARY &  
DANIEL ABEL, D/B/A/ TROUT  
POINT LODGE LTD OF NOVA SCOTIA  
& IN THEIR INDIVIDUAL CAPACITIES  
PROGRESS MEDIA GROUP LIMITED,  
MARILYN SMULDERS, TORSTAR  
CORPORATION, NATIONAL  
GEOGRAPHIC SOCIETY INC., XYZ  
FOUNDATION & JOHN DOES 1-50

CIVIL ACTION NO. 1:15cv382-HSO-JCG

**MOTION FOR LEAVE TO FILE AMENDED COMPLAINT**

NOW into court comes Plaintiff Douglas Handshoe, pursuant to Rules 15 and 20 of the Federal Rules of Civil Procedure, for leave to file a Second Amended Complaint in this matter, a copy of which is attached to the accompanying Memorandum of law in Support thereto. The Second Amended Complaint repleads in a more complete form the counts and allegations against the original defendants from the original complaint, adds an additional defendant necessary to litigate this matter and adds a new causes of action under 17 U.S.C. 512(f) that have occurred since this civil action commenced involving the same defendants.

These matters are discussed more fully in the accompanying Memorandum of Law in support thereof.

WHEREFORE, Plaintiff prays the Court grants this Motion for Leave to File a Second Amended Complaint in this matter.

Respectfully submitted this 10th day of February, 2016,



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Douglas Handshoe, Plaintiff  
Post Office Box 788  
110 Hall Street  
Wiggins, MS 39577  
(228) 284-0004  
[earning04@gmail.com](mailto:earning04@gmail.com)

**CERTIFICATE OF SERVICE**

I, Douglas Handshoe, hereby certify that on February 10, 2016 the foregoing was sent for electronically filing by me via the Clerk of the Court using the ECF system which sent notification to all counsel of record upon filing by the Clerk.

I, Douglas Handshoe, certify that on February 10, 2016 I have sent a true and correct copy of the foregoing to the following via United States Mail:

Daniel G. Abel  
C/O The Super 8 Motel / Desai Enterprises  
2421 Clearview Parkway, Room 106  
Metairie, LA 70001

Vaughn Perret  
189 Trout Point Road  
East Kemptville, NS B5A 5X9, Canada

Charles Leary  
189 Trout Point Road  
East Kemptville, NS B5A 5X9, Canada

Progress Media Group Ltd.  
1202 - 1660 Hollis Street  
Halifax, NS Canada B3J 1V7

Marilyn Smulders  
5163 Duke Street  
Halifax, NS, Canada B3J 3J6

Respectfully submitted this 10<sup>th</sup> day of February, 2016,



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Douglas Handshoe  
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